

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

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IN RE: AQUEOUS FILM-  
FORMING FOAMS PRODUCTS  
LIABILITY LITIGATION

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MDL No. 2:18-mn-2873-RMG

**This Document Relates to Case  
No. 20-cv-02115-RMG**

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**NEW MEXICO’S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT**

**PLEASE TAKE NOTICE**, that upon the accompanying Memorandum of Law in Support of Plaintiffs the State of New Mexico and the New Mexico Environment Department’s (collectively, “New Mexico”) Motion for Leave to File Second Amended Complaint, and accompanying exhibits, New Mexico moves this Court for an Order pursuant to Federal Rule of Procedure 15(a)(2) granting New Mexico leave to file its proposed Second Amended Complaint in this action.

Pursuant to paragraph three (3) of Case Management Order No. 2.A, prior to the filing of this Motion counsel for New Mexico conferred with Co-Lead Counsel for Plaintiffs, who provided their consent and have signed this Motion accordingly. Furthermore, pursuant to Local Rule 7.02, counsel for New Mexico conferred with opposing counsel at the U.S. Department of Justice prior to filing this Motion. The parties conferred via written correspondence on July 1-2, 2024, and via a video teleconference held July 5, 2024. On July 8, 2024, opposing counsel advised that the United States takes no position on the Motion, and reserves any and all defenses to the claims and requested relief in the proposed Second Amended Complaint.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to Local Rule 7.06, opposing affidavits and memoranda of law, if any, must be filed within fourteen (14) days of the filing of this Motion, unless the parties agree otherwise or the Court imposes a different schedule.

Dated: July 8, 2024

Respectfully submitted,

**RAÚL TORREZ, ATTORNEY GENERAL  
FOR THE STATE OF NEW MEXICO**

**NEW MEXICO DEPARTMENT OF JUSTICE**

/s/ William G. Grantham

William G. Grantham

Assistant Attorney General

[wgrantham@nmdoj.gov](mailto:wgrantham@nmdoj.gov)

Post Office Drawer 1508

Sante Fe, NM 87504

505-717-3520

**NEW MEXICO ENVIRONMENT  
DEPARTMENT**

/s/ Zachary Ogaz

Zachary Ogaz

General Counsel

[zachary.ogaz@env.nm.gov](mailto:zachary.ogaz@env.nm.gov)

121 Tijeras Ave. NE, Suite 1000

Albuquerque, NM 87102

505-470-8151

**KANNER & WHITELEY, LLC**

/s/ Allan Kanner

Allan Kanner

[a.kanner@kanner-law.com](mailto:a.kanner@kanner-law.com)

David Ivy-Taylor

[d.ivy-taylor@kanner-law.com](mailto:d.ivy-taylor@kanner-law.com)

Annemieke Tennis

[a.tennis@kanner-law.com](mailto:a.tennis@kanner-law.com)

701 Camp Street

New Orleans, LA 10130

504-524-5777

Approved for filing by Plaintiffs' Lead Counsel:

/s/ Paul J. Napoli

Paul J. Napoli

[pnapoli@napolilaw.com](mailto:pnapoli@napolilaw.com)

/s/ Scott Summy

Scott Summy

[SSummy@baronbudd.com](mailto:SSummy@baronbudd.com)

/s/ Joseph Rice

Joseph Rice

[jrice@motleyrice.com](mailto:jrice@motleyrice.com)